

II. BASIS FOR MOTION

1. Plaintiff's Claims in this suit are for alleged violations of the Fair Credit Reporting Act. Elan Financial Services' investigation of Plaintiff's claims requires its counsel to review loan documentation, communications between the Plaintiff and Elan Financial Services' co-defendants, any communications between Plaintiff and Elan Financial Services and to conduct basic legal research regarding the claims made and defenses available. Because of the complexity of the federal consumer protection claims and the number of contractual documents, legal pleadings, and communications involved, Elan Financial Services' counsel continues to investigate the facts surrounding the Plaintiff's claims and needs additional time to investigate the facts and materials related to the Plaintiff's claims before filing an Initial Responsive Pleading.
2. Subject to any defenses including, but not limited to personal and/or subject matter jurisdiction, Elan Financial Services hereby requests that the Court extend the time for it to file its Initial Responsive Pleading until Friday, January 20, 2017.
3. This motion is not made for the purpose of delay only, but so that justice may be done.

III. REQUEST FOR RELIEF

For the reasons stated above, Elan Financial Services respectfully requests, and Plaintiff and co-defendant consent in the request, that the Court enter an Order extending the time for Elan Financial Services to file its Answer or other Initial Responsive Pleading to January 20, 2017.

Respectfully submitted,

ROWLETT HILL COLLINS LLP

/s/ Donald E. Hill

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served upon all attorneys of record by the Western District of Texas ECF system on this 18th day of January 2017.

/s/ Donald E. Hill

Donald E. Hill